



**JAMES E. JOHNSON**  
*Corporation Counsel*

**THE CITY OF NEW YORK**  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**MARK R. FERGUSON**  
Senior Counsel  
Phone: (212) 356-2507  
Fax: (212) 356-2439  
mferguso@law.nyc.gov

April 3, 2020

**By ECF**

Honorable Steven M. Gold  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Telesford v. NYC DOE, et al.,  
16 Civ. 819 (CBA) (SMG)  
Our No. 2016-008526

Dear Magistrate Judge Gold:

I am the Assistant Corporation Counsel assigned to represent the sole remaining defendant in the above-referenced action, the New York City Department of Education ("DOE"). Per your minute entry order dated November 7, 2019, the parties write to inform the Court that that discovery has been completed and that the parties are still considering whether further settlement negotiations may be fruitful.

Plaintiff has sought information from the New York State Department of Education regarding certification requirements that could affect the outcome of settlement discussions. The New York State Department of Education has not been able to respond to his inquiries due to the COVID-19 crisis. The parties therefore respectfully request sixty (60) days, until June 1, 2020, to inform the Court as to whether a further settlement conference may be worthwhile.

The parties also write to request that the date to submit a briefing schedule to Judge Amon for the defendant's summary judgment motion be extended until a date set by the Court after June 1, 2020, in light of the uncertainty of office closures affecting access to records necessary to prepare the motion.

Thank You for Your consideration of this request.

Respectfully submitted,

/s/

**HONORABLE STEVEN M. GOLD**

United States Magistrate Judge

Telesford v. NYC DOE, et al.,

16 Civ. 819 (CBA) (SMG)

April 3, 2020

Page 2

Mark R. Ferguson  
Senior Counsel

Cc: Daniel E. Dugan  
(By ECF)